

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PROVIDENT LIFE AND ACCIDENT)
INSURANCE COMPANY,)

Plaintiff)

v.)

Case No. 08 CV 3227

JILL GARNER, JAN A. MIX, JOY L.)
MIX and ANGELA L. MANTOVANI,)

Defendants)

NOTICE OF MOTION

To: Michael J. Smith	Barrett W. Thies	W. Sebastian von Schleicher
Smith, von Schleicher &	Smith, von Schleicher &	Smith, von Schleicher &
Associates	Associates	Associates
39 South LaSalle Street	39 S. LaSalle Street	39 South LaSalle Street
Suite 1005	Suite 1005	Suite 1005
Chicago, IL 60603	Chicago, IL 60603	Chicago, IL 60603
(312) 541-0300	312-541-0300	(312) 541-0300
michael.smith@svs-law.com	barrett.theis@svs-law.com	warren.vonschleicher@svs-law.com

PLEASE TAKE NOTICE that on September 11, 2008, at the hour of 9:30 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Joan B. Gottschall in courtroom 2325, or any other judge who may be sitting in her place and stead, Everett McKinley Dirksen Building, 219 South Dearborn Street, Chicago, Illinois, and shall then and there present the **Motion for Entry of Default and Default Judgment**.



Bernard P. Edelman
Attorney for Defendants Jill Garner, Jan A.
Mix and Joy L. Mix

Robert R. Tepper
111 W. Washington St.
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Defendants)

MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT

Now come Defendants Jill Garner, Jan A. Mix and Joy L. Mix, by counsel, and hereby move this Honorable Court enter an order defaulting Defendant Angela L. Mantovani and granting a default judgment in favor of Movants and in support thereof states as follows:

1. This Court requested Defendant Mantovani to file her appearance based upon the representation of Plaintiff's counsel that the summons and complaint had been served.
2. There was no appearance or other response for Defendant Mantovani.

Respectfully submitted,



Bernard P. Edelman
Attorney for Defendants Jill Garner, Jan A.
Mix and Joy L. Mix

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CERTIFICATE OF SERVICE

I, the undersigned, a non-attorney certify under penalties of perjury that I caused a copy of the foregoing Notice of Motion and **Motion for Entry of Default and Default Judgment** to be served upon:

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by causing true and correct copies of same to be sent by **electronic mail** via the CM/ECF system this 2nd day of September, 2008.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 2nd, 2008.



Rebecca Robinson Guinn